

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SIGNAL TECH, LLC

Plaintiff,

v.

ANALOG DEVICES, INC.,

Defendant.

No.

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Signal Tech, LLC, for its Complaint against Analog Devices, Inc., hereby alleges as follows:

**Nature of the Case**

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 271, *et seq.*, to enjoin and obtain damages resulting from Defendants' unauthorized manufacture, use, sale, offer to sell, and/or importation into the United States for subsequent use or sale of products and/or systems that infringe one or more claims of United States Patent No. 6,480,064, entitled "Method and Apparatus for an Efficient Low Voltage Switchable Gm Cell," ("the '064 Patent").

**Parties**

2. Signal Tech, LLC is a Delaware limited liability company that owns the '064 Patent.

3. Analog Devices, Inc. ("Analog") is a Massachusetts Corporation with its principal place of business at One Technology Way, Norwood, Massachusetts 02062. Analog Devices,

Inc. is engaged in the manufacture, sale, and/or importation in the United States of electronic components and systems that infringe the '064 Patent.

**Jurisdiction and Venue**

4. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States.

5. This Court has personal jurisdiction over Analog because it has established minimum contacts with Delaware. Analog, directly and/or through third party manufacturers, manufactures, assembles, or distributes products that are and have been offered for sale, sold, purchased, and used within the state of Delaware. In addition, Analog, directly and/or through their distribution networks, regularly places its products within the stream of commerce, with the knowledge and/or understanding that such products will be sold in Delaware.

6. Analog transacts business in the state of Delaware because, among other things, it distributes products that are offered for sale, sold, purchased, and used within the state of Delaware. Analog has also committed tortious acts of patent infringement in Delaware and is subject to personal jurisdiction in Delaware. Venue is thus proper in this district pursuant to 28 U.S.C. §§ 1391(b), (c), (d) and 1400 (b).

**Cause of Action**

7. Paragraphs 1 through 6 are incorporated by reference as if fully stated herein.

8. The '064 Patent was duly and legally issued on November 12, 2002, by the United States Patent and Trademark Office. A copy of the '064 Patent is attached hereto as Exhibit A.

9. Among other things, the '064 Patent claims a device that contains multiple Gm setting devices and a switching circuit connected to the Gm setting devices.

10. The '064 Patent is valid and enforceable.

11. Signal Tech, LLC is the exclusive and current owner of all rights, title, and interest, in the '064 Patent, including the right to bring this suit for injunctive relief and damages.

12. Upon information and belief, Analog has infringed and continues to infringe one or more claims of the '064 Patent by engaging in acts that constitute infringement under 35 U.S.C. § 271, including but not necessarily limited to making, using, selling, and/or offering for sale, in Delaware and elsewhere in the United States, and/or importing into Delaware or elsewhere in the United States, devices that infringe the '064 Patent.

13. In violation of 35 U.S.C. § 271, Analog Devices, Inc. has been infringing and continues to infringe one or more claims of the '064 Patent through at least the acts of making, using, selling, offering for sale and/or importing infringing products or systems. Analog Devices, Inc.'s infringing products include, without limitation, the AD830 amplifier, the AD8370 amplifier, and the Zero-Drift Operational Amplifiers.

14. Analog's infringement of the '064 patent is exceptional and entitles Signal Tech, LLC to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

**Prayer for Relief**

Wherefore Signal Tech, LLC prays:

- a. That this Court enter judgment that Analog has infringed United States Patent No. 6,480,064;
- b. That Signal Tech, LLC be awarded all damages adequate to compensate it for Analog's infringement of the '064 patent, such damages to be determined by a jury, plus pre and post judgment interest and costs and if necessary to adequately compensate Signal Tech, LLC for the infringement, an accounting;

- c. That this case be declared an exceptional case within the meaning of 35 U.S.C. § 285 and that Signal Tech, LLC be awarded attorneys' fees, costs, and expenses incurred in connection with this action; and
- d. That Signal Tech, LLC be awarded such other and further relief as this Court deems just and proper.

**Jury Demand**

Plaintiff hereby demands a trial by jury of any issue triable by right by a jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: November 2, 2011

FARNAN LLP

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